

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|--|--|
| Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA ECF AND FACSIMILE

February 11, 2016

The Honorable Frank Maas
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 740
New York, NY 10007-1312

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, and defendant World Assembly of Muslim Youth ("WAMY"), write to jointly request an extension of the existing deadline for submission of plaintiffs' motion to compel as to WAMY. On October 27, 2015, counsel for WAMY advised plaintiffs that thousands of additional documents had been discovered during a recent trip to Saudi Arabia, and that it would take until the end of January 2016 for the defendant to review and process those documents. Since WAMY's notification, the defendant has made six (6) separate document productions, totaling approximately 120,000 pages of mostly Arabic documents. Recently, on January 26, 2016, WAMY notified plaintiffs that even more documents have been discovered, estimating that an additional three months will likely be necessary to complete its production.

Plaintiffs submit that the process of analyzing the defendant's documents in advance of plaintiffs' motion will take considerable time, given the volume of the production and need to translate most documents. Plaintiffs have conferred with counsel for WAMY and the defendant agrees an extension is appropriate. Accordingly, the parties respectfully request an extension of the deadline to file any motions to compel to or by defendant WAMY to August 31, 2016.

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Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. Scott Tarbutton", with a long horizontal flourish extending to the right.

J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

cc: MDL Counsel of Record (via ECF)

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